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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

THOMAS R. LAYTON, an individual  
  
Plaintiff,  
  
v.  
  
SPECIALIZED LOAN SERVICING, LLC, a  
Delaware limited liability company d/b/a SLS,  
  
Defendant.

Case No. 2:20-cv-01225-CDS-EJY

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DEFENDANT  
SPECIALIZED LOAN SERVICING, LLC  
TO FILE ANSWER TO PLAINTIFF'S  
FIRST AMENDED COMPLAINT  
[SECOND REQUEST]**

Defendant Specialized Loan Servicing LLC ("SLS") and Plaintiff Thomas R. Layton ("Plaintiff"), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. Plaintiff filed a putative Class Action Complaint ("Complaint") against SLS in the Eighth Judicial District Court for the State of Nevada in the above-captioned action on May 27, 2020.
2. Plaintiff served the Complaint on SLS on May 29, 2020.
3. On June 29, 2020, SLS removed the matter to this Court pursuant to the 28 U.S.C. § 1441 and 28 U.S.C. § 1332(d).
4. The Court later continued SLS's deadline to respond to the Complaint to September 29, 2020 and then November 30, 2020, and finally to January 29, 2021 by virtue of the Court's Order granting the Parties' Stipulation and Order to Extend Deadline for Defendant to File Responsive

1 Pleading to Plaintiff's Complaint (Second Request) (ECF No. 7), the Parties' Stipulation and Order to  
2 Extend Deadline for Defendant to File Responsive Pleading to Plaintiff's Complaint (Third Request)  
3 (ECF No. 12), and the Parties' Stipulation and Order to Extend Deadline for Defendant to File  
4 Responsive Pleading to Plaintiff's Complaint (Fourth Request) (ECF No. 14). The Court entered orders  
5 granting the Parties' stipulations based on, among other things, ongoing settlement efforts and a family  
6 emergency for Plaintiff's counsel requiring her immediate attention.

7 5. SLS filed its Motion to Strike Class Allegations (ECF No. 21) in response to Plaintiff's  
8 Complaint on January 29, 2021.

9 6. On March 1, 2021, Plaintiff filed the First Amended Complaint (ECF No. 27).

10 7. The Court entered an order granting the Parties' Stipulation and Order to Extend  
11 Deadline for Defendant to File Responsive Pleading to Plaintiff's First Amended Complaint (First  
12 Request) (ECF No. 30) on March 10, 2021.

13 8. On April 15, 2021, SLS filed its Motion to Strike Class Allegations (the "Motion") (ECF  
14 No. 31).

15 9. After the Parties completed briefing on the Motion, the Court took the matter under  
16 submission and entered its Order Denying Motion to Strike Class Allegations ("Order") (ECF No.  
17 34) on March 28, 2022 denying the Motion and ordering the Parties to submit a proposed scheduling  
18 order.

19 10. Per the Court's Order, the Parties conferred on a proposed schedule pursuant to Fed. R.  
20 Civ. P. 26(f) on April 8, at which time the Parties also conferred on SLS's request to extend the deadline  
21 to file an answer due to client and counsel availability to prepare an appropriate response. Pursuant to  
22 that discussion, the Parties agreed to extend SLS's deadline to respond to the First Amended Complaint  
23 up to and through April 25, 2022. The First Amended Complaint includes over fifty (50) paragraphs of  
24 allegations, including class allegations regarding Nevada and nationwide classes that SLS contends  
25 implicate a broad swathe of additional defenses that require consideration. As such, SLS requires a  
26 short amount of additional time to evaluate and prepare its answer,

27 11. This request is made in good faith and not for the purpose of delay. Rather, the Parties  
28 believe that the requested continuance will further the interests of efficiency and judicial economy by

1 providing a short extension to allow SLS adequate time to prepare and file its answer and allow the  
2 Parties to proceed efficiently with the remainder of this dispute.

3 THEREFORE, and for good cause shown, the Parties respectfully request that the deadline for  
4 SLS to file a response to the First Amended Complaint be extended up to and including **April 25, 2022**.

5 IT IS SO STIPULATED

6 DATED this 14<sup>th</sup> day of April, 2022.

DATED this 14<sup>th</sup> day of April, 2022.

7 GREENBERG TRAURIG, LLP

DIXON DIAB & CHAMBERS LLP

8  
9 /s/ Jacob D. Bundick

/s/ Deborah S. Dixon

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18 **ORDER**

19 **IT IS SO ORDERED:**

20  
21   
22 **UNITED STATES MAGISTRATE JUDGE**

**DATED: April 14th, 2022**